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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANIKA R. RIECKBORN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

VELTI PLC, ALEX MOUKAS, WILSON W.
CHEUNG, and JEFFREY G. ROSS,

Defendants.

CASE NO.: 3:13-cv-03889-WHO

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE INITIAL
CASE MANAGEMENT
CONFERENCE AND RELATED
DEADLINES**

This Document Relates to:
Case No.: 3:13-cv-03889-WHO,
Rieckborn v. Velti plc, et al.

CHRIS VAFINIS, Individually and on Behalf of
All Other Persons Similarly Situated,

Plaintiff,

v.

VELTI PLC, ALEX MOUKAS, WILSON W.
CHEUNG, and JEFFREY G. ROSS,

Defendants.

CASE NO.: 4:13-cv-03954-YGR

STIPULATION AND [PROPOSED] ORDER
TO CONTINUE INITIAL CMC,
Case No. 3:13-cv-3889-WHO

HAN LEE, Individually and On Behalf of All
Others Similarly Situated,

Plaintiff,

v.

VELTI PLC, ALEX MOUKAS, WILSON W.
CHEUNG, and JEFFREY G. ROSS,

Defendants.

CASE NO.: 3:13-cv-04140-SI

RAYMUND MANABAT, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

VELTI PLC, ALEX MOUKAS, WILSON W.
CHEUNG, JEFFREY G. ROSS, WINNIE W.
TSO, CHRIS KASKAVELIS, DAVID W.
MANN, DAVID C. HOBLEY, JERRY
GOLDSTEIN, NICHOLAS P. NEGROPONTE,
JEFFERIES & COMPANY, INC., RBC
CAPITAL MARKETS, LLC, NEEDHAM &
COMPANY, LLC, CANACCORD GENUITY
INC., and THINKEQUITY LLC,

Defendants.

CASE NO.: 3:13-cv-04606-JSC

1 WHEREAS, on August 22, 2013, plaintiff Anika R. Rieckborn (“Plaintiff”) filed a “Class
2 Action Complaint for Violations of the Federal Securities Laws,” and the above-captioned *Rieckborn*
3 Action was assigned to this Court;

4 WHEREAS, on August 26, 2013, plaintiff Chris Vafinis filed a “Class Action Complaint for
5 Violations of the Federal Securities Laws,” and the above-captioned *Vafinis* Action was assigned to
6 Judge Yvonne Gonzalez Rogers;

7 WHEREAS, on September 6, 2013, plaintiff Han Lee filed a “Class Action Complaint for
8 Violations of the Federal Securities Laws,” and the above-captioned *Lee* Action was assigned to
9 Judge Susan Illston;

10 WHEREAS, on October 4, 2013, plaintiff Raymund Manabat filed a “Class Action
11 Complaint for Violations of the Federal Securities Laws,” and the above-captioned *Manabat* Action
12 was assigned to Magistrate Judge Jacqueline Scott Corley;

13 WHEREAS, on October 21, 2013, various movants filed motions to consolidate the above-
14 captioned *Rieckborn*, *Vafinis*, *Lee*, and *Manabat* Actions, to appoint a Lead Plaintiff pursuant to the
15 requirements of the Private Securities Litigation Reform Act of 1995 (the “Reform Act”), and to
16 approve the selection of Lead Counsel (the “Consolidation Motions”);

17 WHEREAS, a hearing on the Consolidation Motions is scheduled before the Court on
18 November 27, 2013;

19 WHEREAS, an Initial Case Management Conference in the above-captioned *Rieckborn*
20 Action is scheduled for November 26, 2013 at 2:00 p.m., and a Joint Case Management Statement is
21 due to be filed by November 19, 2013;

22 WHEREAS, in light of the pending Consolidation Motions and the requirements of the
23 Reform Act, and to avoid unnecessary expenditure of judicial resources or effort by the parties
24 and the Court, counsel for Plaintiff and Defendant Velti have agreed, subject to approval of the
25 Court, that: (1) the November 26, 2013 Initial Case Management Conference (“CMC”) and
26 related CMC and ADR deadlines in the *Rieckborn* Action shall be adjourned pending a
27 determination on consolidation and the appointment of a Lead Plaintiff; and (2) Defendant need
28

1 not respond to the individual complaint in the *Rieckborn* Action, other than a consolidated
2 complaint or a complaint designated as the operative complaint after the appointment of a Lead
3 Plaintiff; and

4 WHEREAS, the requested continuances are not for the purpose of delay and will not
5 prejudice any party.

6 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the
7 undersigned, subject to approval of the Court:

8 1. The November 26, 2013 Initial Case Management Conference and related CMC and
9 ADR deadlines in the *Rieckborn* Action are hereby adjourned, pending a determination on
10 consolidation and the appointment of a Lead Plaintiff, to such other date and time as this Court shall
11 order.

12 2. Defendant is not required to respond to the individual complaint in the *Rieckborn*
13 Action, other than a consolidated complaint or a complaint designated as the operative complaint
14 after the appointment of a Lead Plaintiff.

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16 Dated: November 13, 2013

Respectfully submitted,

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21 By: /s/ Diane M. Walters
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23 *Attorneys for Defendant Velti plc*
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1 Dated: November 13, 2013

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24 *Attorneys for Plaintiff Anika R. Rieckborn*

ORDER

Upon stipulation of the parties, and good cause appearing:

IT IS SO ORDERED.

Dated: _____

The Honorable William H. Orrick
United States District Judge